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September 21, 1999

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VIA COURIER

Tony Buckley, Esquire  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

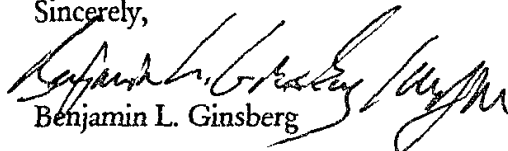
Re: MUR 4648

Dear Mr. Buckley:

Your letter informing us of the Commission's September 17, 1999 denial of the extension in the above-captioned matter arrived late on the afternoon of Yom Kippur, when I was out of the office. This was, for the record, a full five days since our conversation of last Wednesday, in which you gave absolutely no indication that the requested extension would not be granted.

The result of the Commission's denial of an extension routinely granted – and the seemingly tactical delay of not informing us before the weekend – is that we must finalize a probable cause brief in less than 48 hours. Cf. 5 U.S.C. § 555(e). As a matter of fairness, we hereby move that the Commission reconsider its blanket denial of an extension, and at the least, grant the routine extension of 20 days. Cf. *Matthews v. Eldridge*, 424 U.S. 319, 334-35 (1976). Our timely filed extension request of September 13, 1999 provides the “good cause that must be demonstrated.”

Sincerely,

  
Benjamin L. Ginsberg

cc: Chairman Scott E. Thomas  
The Honorable Darryl R. Wold  
The Honorable Lee Ann Elliott  
The Honorable Danny L. McDonald  
The Honorable David M. Mason  
The Honorable Karl J. Sandstrom  
Lawrence M. Noble, Esquire